

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ABRAHAM "AVI" MIRMAN,

Plaintiff,

v.

EXECUTIVE RISK INDEMNITY, INC.

Defendant.

Civil Action No. 1:18-cv-1405-DAB

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that, the undersigned counsel for Plaintiff Abraham "Avi" Mirman shall move, before the Honorable Deborah A. Batts, at the United States Courthouse, Courtroom 24B, 500 Pearl St., New York, NY, for the entry of an Order granting Plaintiff's Motion for Summary Judgment and for such other and further relief as the Court deems just and proper in the above-captioned case.

**PLEASE TAKE FURTHER NOTICE** that in support of Plaintiff's Motion for Summary Judgment, Plaintiff shall rely upon this Notice of Motion, its Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment, Plaintiff's Statement of Undisputed Facts Pursuant to Local Civil Rule 56.1, and the Affidavit of Abraham "Avi" Mirman in Support of Plaintiff's Motion for Summary Judgment, sworn on June 12, 2018, together with its Exhibits, all of which are submitted herewith.

Dated: New York, New York  
June 15, 2018

MCKOOL SMITH, P.C.

By: s/ Adam S. Ziffer

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To: All counsel of record (via ECF)